

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

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| In Re: Robert F. Anderson, Jr. and | : | Bankruptcy No. 19-70428 |
| Drema K. Anderson, | : | |
| Debtors | : | Chapter 13 |
| | : | |
| Wells Fargo Bank, N.A., | : | Document No. 66 |
| Movant | : | |
| | : | Related to Claim No. 3 |
| v. | : | |
| Robert F. Anderson, Jr., Drema K. | : | |
| Anderson and Ronda J. Winnecour, | : | |
| Esquire, Chapter 13 Trustee, | : | |
| Respondents | : | |

DECLARATION REGARDING NOTICE OF MORTGAGE PAYMENT CHANGE

I, counsel for the above-named Debtors, declare and otherwise certify that I have reviewed the Debtors' existing Chapter 13 Plan dated December 7, 2022, have recomputed the plan payment, and find that the existing payment by Debtors is sufficient to fund the plan. The Movant's Notice of Mortgage Payment Change dated November 21, 2023 decreases Debtors' monthly escrow payment from \$385.69 to \$335.04, thereby decreasing Debtors' monthly payment from \$1,522.00 to \$1,471.35, effective January 1, 2024. Based upon this adjustment, Debtors' monthly mortgage payment due January 1, 2024 will be \$1,471.35, unless or until future adjustments are made by the Movant.

The new monthly mortgage payment of \$1,471.35 beginning January 1, 2024 represents a decrease of \$50.65 per month for the remainder of Debtors' Chapter 13 Plan. Debtors' Plan remains adequately funded to pay the new post-petition monthly payments described in Movant's Notice of Mortgage Payment Change dated November 21, 2023.

Respectfully submitted,

EVEY BLACK ATTORNEYS LLC

Dated: 11/22/2023

By /s/ Jeffrey A. Muriceak
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